

1 THE HONORABLE KYMBERLY K.
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9
10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 CHRISTOPHER WALKER, an individual,

14 Plaintiff,

15 v.

16 DANIEL L. BARNETT and SHERRI
17 MILLER BARNETT, and the marital
18 community comprised thereof; AVIARA
19 CAPITAL PARTNERS, LLC, a California
limited liability company, HEALTH
PROFESSIONALS ALLIANCE, a Delaware
Corporation; BE HOLDINGS, LLC, an
Oregon limited liability company; BE
CAPITAL PARTNERS LLC, an Oregon
limited liability company,

Defendants.

No.: 2:23-cv-00163-KKE

STIPULATED MOTION AND PROPOSED
ORDER EXTENDING DISCOVERY AND
DISPOSITIVE DEADLINES

**NOTE ON THE MOTION CALENDAR:
OCTOBER 20, 2023**

20 The undersigned parties, by and through their counsel of record, stipulate and
21 respectfully request that the Court grant a 30-day extension of the discovery and dispositive
22 motions deadlines. *See* Dkt. # 23 (May 10, 2023 Order Setting Jury Trial Date and Related
23 Dates).

24 Counsel from all parties have conferred and request the extension based upon the
25 Parties' agreement to participate in a mediation in November.

1 In light of the facts described above, the parties believe there is good cause under
 2 Local Rule 10(g), for a continuance of the case deadlines. The parties propose the following
 3 changes to the schedule:

Event	Current Deadline	Proposed Deadline
All motions related to discovery must be filed by	11/20/2023	12/20/2023
Discovery completed by	12/20/2023	1/19/2024
All dispositive motions and motions challenging expert witness testimony	1/18/2024	2/17/2024

10 DATED: October 20, 2023
 11

12 /s/ Troy Romero

13 Troy Romero, WSBA #19044
 14 Attorneys for Plaintiff

/s/ Laura Caldera Loera

Laura Caldera Loera, WSBA #59502
 15 Attorneys for Defendant, Health
 16 Professionals Alliance

/s/ Chad Colton

Chad Colton, WSBA #49412

17 Attorneys for Daniel Barnett, Sherri Miller
 18 Barnett, Aviara Capital Partners, LLC, BE
 19 Holdings, LLC and BE Capital Partners,
 LLC

20 IT IS SO ORDERED this 23rd day of October, 2023.

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 Kymberly K. Evanson
 United States District Judge

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2 Presented by:

3 BULLIVANT HOUSER BAILEY PC

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5 By /s/ Laura Caldera Loera

6 Laura Caldera Loera, WSBA #59502

E-mail:laura.loera@bullivant.com

7 Attorney for Defendant Health Professionals Alliance Inc.

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